

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

In re:	§
RAVEN RENEE SECONDINE	§ Case No. 3:21-bk-02510
	§
	§ Adversary Proceeding No. 3:21-ap-90160
	§
Debtor	§ Chapter 7
	§
ERIC R. JOHNSON, TRUSTEE	§
Plaintiff	§ CONTESTED MATTER
v.	§
CARVANA, LLC and	§
RAVEN RENEE SECONDINE	§
Defendant	§
	§
	§

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**ANSWER**

COMES NOW, Carvana, LLC and makes and files it's Answer to Trustee's Complaint to Avoid Security Interest of Carvana, LLC; To Recover Value of Avoided Transfer; And Authority to Sell Property Free and Clear of Lien:

**SPECIFIC RESPONSES**

**1.**

Admitted.

**2.**

Admitted.

**3.**

Admitted.

**4.**

Admitted.

**5.**

Admitted.

**6.**

Admitted.

**7.**

Admitted.

**8.**

Admitted.

**9.**

Admitted.

**10.**

Admitted.

**11.**

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 11 and therefore denies same.

**12.**

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 12 and therefore denies same.

**13.**

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 13 and therefore denies same.

**14.**

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 14 and therefore denies same.

**15.**

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 15 and therefore denies same.

**16.**

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 16 and therefore denies same.

**17.**

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 17 and therefore denies same.

**18.**

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 18 and therefore denies same.

**19.**

Defendant reiterates and incorporates by reference its previous responses.

**20.**

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 20 and therefore denies same.

**21.**

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 21 and therefore denies same.

**22.**

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 22 and therefore denies same.

**23.**

Defendant reiterates and incorporates by reference its previous responses.

**24.**

Denied.

**25.**

Denied.

**26.**

Denied.

**27.**

Denied.

**28.**

Defendant reiterates and incorporates by reference its previous responses.

**29.**

Denied.

**30.**

Denied.

**31.**

Defendant reiterates and incorporates by reference its previous responses.

**32.**

Denied.

**33.**

Denied.

**34.**

Denied.

**35.**

Denied.

This the 14<sup>th</sup> day of December 2021

Respectfully Submitted

**/s/Richard B. Maner**

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**CERTIFICATE OF SERVICE**

This is to certify that I have served a copy of ANSWER electronically. Those not served electronically have been served by depositing same in the United States Mail in a properly addressed envelope to each with adequate postage thereon as follows:

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SUITE 184  
NASHVILLE, TN 37221

U.S. Trustee  
US TRUSTEE  
OFFICE OF THE UNITED STATES TRUSTEE  
701 BROADWAY STE 318  
NASHVILLE, TN 37203-3966

This the 14<sup>TH</sup> day of December 2021

/s/Richard B. Maner  
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